United States Department of Agriculture

Forest Service Manti-LaSal National Forest 599 West Price River Drive Price, Utah 84501

Reply to: 2820

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RECEIVED

Date: October 15, 1985

Mr. Wayne Hedberg Division of Oil, Gas and Mining 355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 OCT 2 1 1985

DIVISION OF OIL

Dear Mr. Hedberg:

The Forest Service has reviewed your letter and enclosure dated September 5, 1985, concerning Abatement Plans and MRP Amendment for Notices of Violations N85-4-5-2, N85-4-12-3, and N85-4-16-1. Our comments are as follows:

- 1. The factor of safety used for this type of structure is normally 1.5, and we request that the new design and construction also be 1.5.
- 2. The design life of the mine is continually being extended. Originally, it was three years, then 10 years, and now 20 years. Based on this, we request that a normal design life of 20 years be used.
- 3. Our studies show that a runoff curve number of 83 would be more appropriate for the ground conditions of the local area.
- 4. We request that storm generations of one, two, and six hours be analyzed, and that the largest flood flow generated by modeling these storms be used as the design flood flow. Fletcher (1981) indicated only one storm in seven years of record exceeded 15 hours, and that approximately 80 percent of the storms lasted for two hours or less.

This leads us to the conclusion that peak flows have been underestimated. The acceptance of calculations and design by Earthfax will result in a high probability of exceeding the designs. This could cause a significant increase in the sediment load to Crandall Canyon and Huntington Canyon during the life of the project.

If there are any questions, please contact us.

Sincerely,

for ()
REED C. CHRISTENSEN
Forest Supervisor